

Javier L. Merino, Esq.
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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

HOLLY RINGLING, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

BETMGM, LLC,

Defendant.

Civil Action No.: 2:22-cv-07462-JXN-CLW

CERTIFICATION OF MARC E. DANN
IN SUPPORT OF MOTION FOR
ADMISSION *PRO HAC VICE*

I, MARC E. DANN certify as follows pursuant to Local Civil Rule 101.1(c):

1. I am the Managing Partner with the DannLaw Firm, with my principal office located at 15000 Madison Avenue, Lakewood, Ohio 44107 (216) 373-0539, attorneys for Plaintiff, Holly Ringling, individually and on behalf of all others similarly situated (collectively, "Plaintiffs") in the above-captioned matter. I am fully familiar with the facts and circumstances surrounding this litigation, and I submit this declaration in support of Plaintiffs' application for an Order admitting me as counsel *pro hac vice* in this action and in any related mediation or arbitration.

2. I have been admitted to practice before the following courts in the years indicated:

- a. United States Court of Appeals for the Sixth Circuit, 1991
- b. United States Court of Appeals for the Seventh Circuit, 2022
- c. United States District Court for the Northern District of Ohio, 1991
- d. United States District Court for the Southern District of Ohio, 2006
- e. United States District Court for the Northern District of Illinois, 2015
- f. United States District Court for the Northern District of Indiana, 2016
- g. United States District Court for the Northern District of New York, 2022

3. I am currently, and continuously have been since the dates indicated above, a member in good standing in each of those jurisdictions. To my knowledge, no charges have been brought against me regarding my practice in those jurisdictions, and I am not suspended or disbarred.

4. I have never been convicted of a felony or a crime; however, I was disciplined by the Ohio Supreme Court in May 2007, as detailed further in the attached "Exhibit A". I have no disciplinary or contempt proceedings involving me pending before any court, nor have I been denied admission to any court during the last five years.

5. I agree to abide by the ethical standards governing the practice of law in this Court pursuant to the New Jersey State Lawyer's Code of Professional Responsibility and submit to this Court's Local Rules. I will comply with all provisions of Local Rule 101.1(c).

6. Pursuant to the rules of this Court, all papers filed on behalf of Defendants will be filed by local counsel Javier L. Merino, Esq., or another attorney admitted in the State of New Jersey.

7. All fees to the Clerk of the Court and the New Jersey Lawyers' Fund for Client Protection shall be timely made.

8. The purpose of this application is to make it possible for me to represent Plaintiffs, which has sought my advice and assistance with respect to this litigation.

9. For the foregoing reasons, I respectfully request this Court admit me pro hac vice in the above-entitled action.

I declare, under penalty of perjury, that the foregoing is true and correct.

Date: February 14, 2023

Respectfully submitted,

THE DANN LAW FIRM, P.C.

/s/ Marc E. Dann

Marc E. Dann (OH# 0039425) *

Brian D. Flick (OH# 0081605)*

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**Pro Hac Vice Pending*

Counsel for Plaintiff

Holly Ringling and the Putative Class

EXHIBIT A



Columbus | Cincinnati | Cleveland | New Jersey | New York

**Dann
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February 14, 2023

Office of Attorney Admissions
United States District Court
District of New Jersey

Re: *Holly Ringling, et al. v. BetMGM, LCC*
United States District Court, District of New Jersey
Case No.: 2:22-cv-07462-JXN-CLW

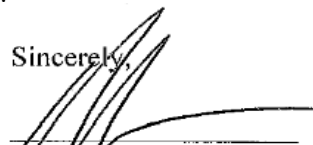
Dear Sir or Madam:

Pursuant to my recent Motion for admission *Pro Hac Vice* in the above action, I submit the following explanations:

1. In May 2007, while I was serving as the elected Attorney General of Ohio, I was charged with two misdemeanor ethics violations that were said to have occurred while I was in office. I contested both the criminal charges and the ethics violations. The criminal case was resolved by a plea agreement pursuant to which I was sentenced to a fine and community service. I resigned as Attorney General, self-reported the conviction to the Ohio Supreme Court Office of Disciplinary Counsel, paid the fine, and successfully completed the community service. In the disciplinary case, I accepted responsibility for my actions and was suspended from practice for six months from November 2012 to May 2013. In May 2013, I submitted the required documentation and was restored to active status in June 2013.
2. The issues in the criminal case and the disciplinary case were the same in both cases: 1) had I correctly disclosed a gift of travel on a private airplane; and 2) was my campaign practice that state employees working for my political campaign should take leave from their state jobs and be paid for their time working for my campaign by the campaign? As to the first, I disclosed the trip on the airplane and valued it at \$12,000. The Ohio Ethics Commission argued that, while the gift was permissible, the true value of it was \$17,000. As to the second, my campaign had required employees of the state's Attorney General's Office to take leave from their state jobs and be paid by my campaign for the time that they worked on the campaign. The state took the position that those payments were prohibited supplements to the salaries of state employees.

If you require anything further, please contact our office.

Sincerely,



Marc E. Dann (0039425)
Attorney at Law